

EXHIBIT “B”



June 29, 2023

VIA ELECTRONIC MAIL

Mr. Kevin Crowley
March Forward
918 Maple Street
Conshohocken, PA 19428
KCrowley@marchfwd.com

Re: Paul and Marie Friedman

Dear Mr. Crowley:

We represent Paul and Marie Friedman (“the Friedmans”). This is in reply to your email of June 22 to the Friedmans.

Based on the information and data I have thus far seen, it appears to me that there is at the very least a considerable likelihood that the Penn Mutual policies placed on the lives of the Friedmans, and the premium financing program they were importuned to use, were individually and collectively unsuitable for their needs. Indeed, after a decades-long career in life insurance litigation, I will say this is one of the most unsuitable placements I have ever seen.

The Friedmans and I are prepared to meet with you and your counsel to discuss resolving these issues, provided that two conditions are agreed at once.

First, we would expect such a meeting to be among persons with authority to conclude a settlement that included rescission of the policies and return of premium to the Friedmans.

Second, the Friedmans would require that you, any of your colleagues who were involved in recommending the placement of these policies, and any of the entities by which you or they are or were employed, acknowledge and agree that by the receipt of this letter you and all of them have been notified that any documents, notes, electronic information, data, or other records or evidence of any kind or nature whatsoever regarding or bearing upon any transactions, communications, recommendations or activities of any kind or nature whatsoever concerning the Friedmans have been and will be preserved for use as evidence in the litigation that may, if need be, commenced shortly by the Friedmans.

Mr. Kevin Crowley

June 29, 2023

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Kindly advise me of your response at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Stephen C. Baker", enclosed within a light gray rectangular border.

Stephen C. Baker

SCB:tab